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Reed Smith LLP ("Reed Smith"), counsel to various creditors that have filed an objections to the Debtors' Joint Chapter 11 Plan of Reorganization Dated March 16, 2020 (collectively, the "Objectors" or "Objection," as applicable) [Dkt. No. 7339], submits this Notice in accordance with the Court's Order Establishing Confirmation Hearing Protocol [Dkt. No. 7182], which directs, inter alia, that by May 22, 2020, "All parties that intend to participate at the Confirmation Hearing must provide the Court with the names and e-mail addresses of all speaking attorneys and witnesses." The Objectors file this Notice as a protective measure, in the event that any ground for objection raised in the Objections becomes at issue during the confirmation proceedings: The Objectors are as follows:

- Paradise Irrigation District
- Paradise Unified School District
- Northern Recycling and Waste Services, LLC/Northern Holdings, LLC
- Napa County Recycling & Waste Services, LLC/Napa Recycling & Waste Services, LLC
- Christian & Missionary Alliance Church of Paradise, dba Paradise Alliance Church

David Weiss (dweiss@reedsmith.com) of Reed Smith will be the "speaking attorney" on behalf of the Objectors. The Objectors do not intend to call any witnesses in connection with the confirmation proceedings, but reserve the right to call witnesses at a later date, as necessary.

20 DATED: May 22, 2020

REED SMITH LLP

By: /s/ Peter S. Munoz
Peter S. Munoz
David E. Weiss
Attorneys for Certain Fire Victim Creditors

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